

IN THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF ILLINOIS

SUNTEZ. Pasley B20690
ET. AL

Plaintiffs

VS.

SHERIFF(S)

Mearl Justus (Deceased)

RICK Watson et. al,

Defendants

Case # 14-505-JPG

Civil Rights Complaint

This Civil rights Complaint is brought by the plaintiffs in regards to how their Constitutional Rights were violated by the defendants intentional and deliberate actions of operating a County Jail in a poor and life threatening manner stemming from inadequate and unreasonable living conditions pursuant to 42 U.S.C. 1983 and in good faith the plaintiffs asks this court to sustain this complaint on all grounds stated herein.

I. Background

The plaintiffs are subjected to poor and inadequate living conditions, overcrowding, insects; mice, foul odor from human waste; small portions of food per serving, inadequate access to Law Library, paint peeling of the walls, tables, bars, toilet areas, Shower area and Ceilings;

Cleaning material denied daily to keep toilets and Sinks Clean as well as the Shower area and no outside RECREATION or any RECREATION for that matter given due to overcrowding. Plaintiffs and other inmates are being Subjected to medical issues due to the filthy and poor living conditions they're being exposed to.

Plaintiffs and other inmates are being Subjected to foul odors from human feces due to cleaning material not being passed out to operate and keep a clean and healthy living area throughout the County Jail. The defendants et.al. are/were intentionally denying the plaintiffs all of the issues stated within the body of this Civil Complaint.

II. PARTIES

1. Sinter Pasley was an inmate at the ST. CLAIR Co. JAIL under # 17020 at all times relevant to this civil matter and is now an inmate in Menard Correctional Center along with the other said plaintiffs mentioned in this civil matter
- 2) Claude Williams was an inmate at the St. Clair Co. Jail under # 438172 at all times relevant to this civil matter.
- 3) Isaiah Ross was an inmate at the St. Clair Co Jail under # 436083 at all times relevant to this civil matter.
- 4) Darrion Lewis was an inmate at the St. Clair Co. Jail under # 444372 at all times relevant to this civil matter
- 5) Antonio Taylor was an inmate at the St. Clair Co Jail under #444973 at all times relevant to this civil matter.

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that all inmates past present and future were and will be subjected to Constitutional Violations Stated in this Civil matter at the St. Clair County Jail.

Mearl Justus was and Rick Watson is the Sheriff at the St. Clair County Jail at all times relevant to this Civil matter.

Officer Jack Dinges was and is the Lieutenant in Charge of the 6 a.m. to 6 p.m. Shift at the St. Clair Co. Jail at all times relevant to this Civil matter.

Officer Nichols was and is the Seargent in Charge of the 6 a.m. to 6 p.m. Shift at the St. Clair Co. Jail at all time relevant to this Civil matter.

Officer Levi Bridges was and is the Seargent in Charge of the Sanitation Department on the 6 a.m. to 6 p.m. Shift at the St. Clair County Jail at all times relevant to this Civil matter.

Officer Cameron Reid is and was an officer in Charge of the Sanitation Department on the 6 a.m. to 6 p.m. Shift at the St. Clair County Jail at all times relevant to this Civil matter

A. Parties Involved

The plaintiffs contends that they were personally involved in the unconstitutional acts imposed upon them by the defendants intentional actions of denying them the matters asserted in the "Statement of Facts." All of the defendants personally knew about the Constitutional violations, but did absolutely nothing to correct them.

III. Statement of Facts

1.) That plaintiffs filed grievances and complaints with the defendants and their agency at the St. Clair County Jail on the issues of "Poor living conditions, denial of cleaning material; Small amounts of food per serving, denial of outside recreation; denial of adequate access to Law Library, insects and mice in units; overcrowding of inmates, sleeping on floors that are filthy due to denial of cleaning material and items, filthy sinks, toilets, and showers; paint peeling off the walls and tables, ceilings, bars showers and toilet areas... and the issues were not corrected by the defendants to legally and properly operate a clean and healthy county jail.

2.) That the grievances and complaints were not returned to the plaintiffs to cover up the constitutional violations and to not address them to put an end to them.

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3.) That plaintiffs and other prisoners are being subjected to sleeping on the filthy floor within the jail and the defendant(s) are very aware of this constitutional violation and are not doing anything to correct it.

4.) That the plaintiffs and other prisoners are being illegally and unconstitutionally subjected to denial of adequate access to law library time and out of cell recreation time within the yard area and gym to gain some type of physical exercise. The defendant(s) are very aware of this constitutional violation and are not doing anything to correct it.

5.) That plaintiffs and other prisoners are being subjected to insects and mice in their living areas. The defendants are aware of this constitutional violation and are not doing anything to correct it.

6.) The plaintiffs and other prisoners are being subjected to small amounts of food per serving due to the menu not being followed properly. The defendants are very aware of this constitutional violation and are not doing anything to correct it.

7.) That plaintiffs and other prisoners are being subjected to foul odors of human feces, odors from sink and toilet areas due to cleaning material not being passed out daily to keep such areas clean. The defendants are very aware of this constitutional violation and are not doing anything to correct it.

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8.) That cleaning material to clean the stairs, sinks and toilets are passed out only on "Tuesdays" and it is not enough. The defendants are aware of this fact and refuse to pass out cleaning agent and items to keep said areas clean daily.

9.) That the plaintiffs and other prisoners are being denied medical attention due to medical staff deliberately failing to treat prisoners and plaintiffs right away upon being notified of the medical issues stemming from the uncleaness and unhealthy jail conditions. The defendants are aware of this fact and refuse to do anything to correct it.

10.) That plaintiffs and other inmates/prisoners are being subjected to sleep on the floors due to overcrowding at the jail. The defendants are aware of this constitutional violation and are not doing anything to correct it.

11.) The plaintiffs are suing the defendants for violating their 6th, 8th, and 14th amendment rights under the United States Constitution, and the defendants are being sued in their personal, official and individual capacities for violating plaintiffs constitutional rights.

12.) That the plaintiffs tried to subside the constitutional violations stated herein by complaining to defendants in the proper manner of rendering grievances and complaints but the defendants deliberately and constantly ignored the issues by totally refusing to address and solve the matters to end the constitutional violations.

- 1.) Trial by Jury on all triable issues.
- 2.) Order defendants to pay \$50,000,000.00 for Violating the plaintiffs Constitutional rights.
- 3.) Order defendants to pay plaintiffs \$50,000,000.00 in punitive, compensational, and emotional damages for Violating the plaintiffs Constitutional Rights and grant declaratory Judgment.
- 4.) Grant plaintiffs an injunction against defendants to stop the Constitutional violations subjected to plaintiffs at this time and in the future.
- 5.) Grant an attorney to represent the plaintiffs for/in this Civil rights Complaint.
- 6.) Order defendants not to retaliate against plaintiffs for filing this Civil rights Complaint.
- 7.) Enter an order against defendants to correct all of the Constitutional violations mentioned in this Civil Rights Complaint.
- 8.) Grant any and all manners respectfully deemed necessary by this court to the plaintiffs.

Respectfully Requested,

X Sunterz P. Pasley B-20690 / Sunterz Pasley B-20690 / P.O. Box 1000
 Menard, IL 62259
 X Claude Williams / P.O. Box 1000
 MENARD, IL 62259
 CLAUDE WILLIAMS
 X Darrion Lewis / Darrion Lewis / P.O. Box 1000
 Menard, IL 62259
 X Isaiah Ross / ISAIAH Ross / P.O. Box 1000 Menard, IL 62259
 X Antonio Taylor / Antonio Taylor / P.O. Box 1000 Menard, IL 62259

Verification

I have read the foregoing Complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true. I Certify under penalty of perjury that the foregoing is true and correct.

Executed at Menard Correctional Center.
Menard, IL 62259 on APRIL 29TH 2014

x Sunter Pasley B-20690

Sunter Pasley B-20690

x Claude Williams

Claude Williams B88342

x Darrion Lewis

Darrion Lewis # B88596

x Isaiah Ross

Isaiah Ross # B88217

x Antonio Taylor

Antonio Taylor # B88921

4/29/14
DATE